

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**FEDERAL TRADE COMMISSION,  
STATE OF ILLINOIS, and  
STATE OF MINNESOTA,**

*Plaintiffs,*

v.

**GTCR, LLC,  
GTCR BC HOLDINGS, LLC, and  
SURMODICS, INC.,**

*Defendants.*

**Case No. 1:25-cv-02391**

**JOINT MOTION FOR EXTENSION OF TIME FOR  
PRELIMINARY INJUNCTION BRIEFING**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), the Parties respectfully request that the Court extend the deadline in the Amended Schedule (Dkt. 167) for Defendants' Opposition to Plaintiffs' Motion for Preliminary Injunction ("Opposition") and Plaintiffs' Reply in Support of its Motion for Preliminary Injunction ("Reply"). In support of this Motion, the Parties state as follows:

1. On July 10, 2025, the Court entered an Amended Schedule (Dkt. 167), under which Defendants' Opposition is due July 31, 2025, and Plaintiffs' Reply is due August 12, 2025.
2. As discussed at the July 25, 2025 hearing, the Parties have completed a substantial amount of discovery, including taking over 50 depositions to date. Despite the Parties' best efforts to complete fact discovery by the July 10, 2025 deadline, certain third-party productions and

depositions have yet to be completed—including, critically, the deposition of the buyer for the signed divestiture (the “Proposed Buyer”) discussed at the July 25, 2025 hearing.

3. The Proposed Buyer completed its document production on July 28, 2025, and the Parties have agreed to conduct the deposition of the Proposed Buyer’s corporate representative on July 31, 2025. Given the Parties’ need to complete and incorporate discovery from the Proposed Buyer’s documents and deposition, the Parties need additional time to submit the Opposition and Reply, as previewed during the July 25, 2025 hearing.

4. Accordingly, the Parties respectfully request that the Court extend the deadline for Defendants’ Opposition to August 3, 2025, and the deadline for Plaintiffs’ Reply to August 14, 2025. Federal Rule of Civil Procedure 6(a)(1)(C) does not apply to the extent these deadlines fall on a weekend.

July 30, 2025

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

Pursuant to Local Rule 5.9, I hereby certify that on this 30<sup>th</sup> day of July 2025, the foregoing was electronically filed using the Court's CM/ECF system and constitutes service to the attorneys of record who have consented to accept service by electronic means.

Dated: July 30, 2025

/s/ Sean M. Berkowitz  
Sean M. Berkowitz